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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 3:07-CV-5944 SC  
MDL No. 1917

This Document Relates To:

Case No. 2011-CV-6205 SC

STATE OF FLORIDA,  
OFFICE OF THE ATTORNEY GENERAL,  
DEPARTMENT OF LEGAL AFFAIRS,

Plaintiff,

v.

LG ELECTRONICS, INC., *et al.*

Defendants.

**DECLARATION OF SATU A. CORREA  
IN SUPPORT OF STATE OF FLORIDA'S  
MOTION TO SERVE DEFENDANT  
BEIJING-MATSUSHITA COLOR CRT  
CO., LTD. THROUGH ITS U.S. COUNSEL  
PURSUANT TO FED. R. CIV. P. 4(f)(3)**

Date: May 21, 2012

Time: 10:00 a.m.

Location: JAMS, Two Embarcadero Center,  
Suite 1500

Judge: Hon. Samuel Conti

Special Master: Hon. Charles A. Legge (Ret.)

**DECLARATION OF SATU A. CORREA**

I, Satu A. Correa, hereby declare as follows:

1. I am an Assistant Attorney General with the Florida Office of the Attorney General and I represent the State of Florida (“Florida”) in the above-captioned action as well as the related multidistrict litigation captioned *In re Cathode Ray Tube (CRT) Antitrust Litigation*, 3:07-cv-05944-SC (the “MDL”), which are currently pending in the United States District Court for the Northern District of California.

2. I have personal knowledge of the matters stated herein and I could and would competently testify thereto if called as a witness.

3. I am a member in good standing of the State Bar of Florida and admitted to practice before the United States District Court for the Northern District of Florida. I am admitted to practice *pro hac vice* in the MDL pending in the United States District Court for the Northern District of California.

4. I submit this declaration in accordance with Local Rule 7-5, N.D. Cal., to set forth facts in support of the State of Florida’s Motion to Serve Defendant Beijing-Matsushita Color CRT Co., Ltd. (“BMCC”) Through Its U.S. Counsel Pursuant to Fed. R. Civ. P. 4(f)(3) filed concurrently herewith.

5. On or about December 2011, Florida filed a complaint (the “Complaint”) in the United States District Court for the Northern District of California against various Defendants for conspiring to fix the prices of cathode ray tubes (“CRTs”) in violation of Section 1 of the Sherman Act and under Florida antitrust and unfair competition laws. Florida’s action was consolidated with MDL No. 1917 as a related action on or about January 2012.

6. One of the Defendants named in Florida’s Complaint is Beijing-Matsushita Color

1 CRT Co., Ltd., a Chinese company headquartered in Beijing, China.

2 7. After filing Florida's action, Eli Friedman, who at the time was an Assistant  
3 Attorney General with the Florida Office of the Attorney General, and I contacted the U.S.  
4 counsel for the various Defendants, including Terry Calvani of Freshfields Bruckhaus Deringer  
5 US LLP ("Freshfields"), counsel for BMCC in this MDL for related actions, regarding service of  
6 the Complaint. Mr. Friedman and I asked Mr. Calvani whether BMCC would stipulate to a  
7 waiver of service of process. Mr. Calvani indicated that he had not been retained by BMCC to  
8 represent it in Florida's action and thus could not speak on BMCC's behalf regarding Florida's  
9 request for a waiver of service of process.  
10

11 8. Twenty-four other Defendants stipulated to the waiver of service of process in a  
12 stipulation filed with the Court on March 23, 2012 (the "Service Stipulation"). *See* Docket No.  
13 1108. BMCC was not one of the Defendants who joined in the Service Stipulation.  
14

15 9. Freshfields first appeared in the MDL on behalf of BMCC on or about July 17,  
16 2008. *See* Docket No. 330. Since then, Freshfields has appeared numerous times as counsel for  
17 BMCC, including accepting service of process, objecting to discovery requests, filing motions to  
18 dismiss, and answering complaints. *See, e.g.,* Docket Nos. 372, 400, 463, 479, 485, 546, 551,  
19 555, 614, 618, 667, 677, 678, 780, 813, 858, 936, 975, and 1043. BMCC has accepted service of  
20 process in the Indirect Purchaser Plaintiff actions and in the action brought by Electrograph  
21 Systems, Inc. and Electrograph Technologies, Corp. *See* Docket Nos. 372, 936.  
22

23 10. Judge Conti signed a Scheduling Order for the MDL on April 3, 2012. According  
24 to this Scheduling Order, fact and expert discovery is to close on August 30, 2013.  
25

26 11. Based upon experiences in other cases and discussions with other attorneys in this  
27 case, I am aware that service of process on a foreign company is a time-consuming process that  
28

1 can take up to several months and cost up to thousands of dollars.

2 I declare under penalty of perjury under the laws of the United States of America that the  
3 foregoing is true and correct.

4 Executed this 27th day of April, 2012, in Tallahassee, Florida.

6 /s/ Satu A. Correa

7 Satu A. Correa